

REMARKS

The Office Action mailed May 6, 2004 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-20 were pending in the application. Claims 1 and 18-20 have been amended, new claims 21-22 have been added and no claims have been cancelled. Therefore, claims 1-22 are pending in the application and presented for reconsideration.

This amendment changes and adds claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, are presented, with an appropriate defined status identifier.

In the Office Action, claims 19 and 20 are objected to because of their dependencies. In reply, applicants have amended these claims to address the objections and submit that these claims are now unobjectionable.

Claim 20 is rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. In reply, applicants have amended this claim in accordance with the examiner's suggestion and submit that the pending claim 20 meets the requirements of 35 U.S.C. §101.

In the Office Action, claims 1, 2, 6, 7, 11, 12, 14-17, 19, and 20 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent 5,572,670 to Puckett (hereafter "Puckett"). Claims 3 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Puckett, further in view of U.S. Patent 6,708,166 to Dysart et al. (hereafter "Dysart"). Claims 4, 5, and 10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Puckett, further in view of Dysart, further in view of U.S. Patent 5,025,458 to Casper et al. (hereafter "Casper"), further in view of U.S. Patent 6,157,988 to Dowling (hereafter "Dowling"). Claim 8 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Puckett, further in view of U.S. Patent 4,945,479 to Rusterholz et al. (hereafter "Rusterholz"). Claim 9 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Puckett, further in view of U.S. Patent 5,406,563 to Loebig (hereafter "Loebig"). Claims 13 and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Puckett. Applicants respectfully traverse these rejections for at least the following reasons.

Each of the independent claims 1 and 18-20 recite a method (or system/software) that, *inter alia*, (1) receives an inbound document from a trading partner, (2) translates the inbound document to a target format and captures error data to a tracking database, and (3) extracts and saves an internal document identifier that correlates the error data in the tracking database to the inbound document from the particular trading partner. As recited in dependent claims 21-22, this allows the error data corresponding to an inbound document for a particular trading partner to be identified and this information can be provided to the trading partner to either improve the quality of the inbound documents or the translation process. See, for example, page 5, lines 28-33 of the specification that discusses these features. These recited features are not disclosed or suggested by the applied prior art.

Specifically, the office action relies on the primary reference Puckett for disclosing these claimed features. However, with respect to features (1) and (2) above the office action cites to col. 6, line 15-25 of Puckett which only discloses that the translation system 100 receives a query from an intelligent client database 104 (that has a higher level of intelligence associated with data therewith when compared to error log database 168 which receives data from data sensors of the data storage system). There is simply no disclosure of receiving inbound documents from a trading partner containing information about which translation errors are captured into a tracking database.

Furthermore, there is simply no teaching regarding feature (3) which requires that the tracking database be indexed by internal document identifier that indexes the errors and correlates it to the received inbound documents from a particular trading partner. With respect to this features, the office action cites to col. 3, lines 4-12 of Puckett which simply discloses that the error log database contains information related to events in the data storage system 172. That is, per the office actions own mapping, Puckett does not store the errors from the received documents (“queries from the intelligent database 104”) and nor are the errors indexed to these queries. Therefore, these recited features in the independent claims are not disclosed or suggested by Puckett.

Furthermore, these deficiencies in Puckett are also not cured by any of the other applied references. Accordingly, the office action fails to make a *prima facie* case of

obviousness with respect to the pending independent claims. Accordingly, independent claims 1 and 18-20 are believed to be patentable over the applied prior art.

The dependent claims are also patentable for at least the same reasons as the independent claims on which they ultimately depend. In addition, they recite additional patentable features when considered as a whole.

For example, as discussed above, the new claims 21 and 22 recite features where the internal document identifier is used to identify error data correlated to specific inbound documents and/or trading partners so that information can be provided to the specific trading partners based on the error data identified to inbound documents from that trading partner. Therefore, neither these recited features nor their advantages, are disclosed or suggested by the applied prior art and provide an additional reason for the patentability of these claims.

In view of the foregoing amendments and remarks, applicants believe that the application is now in condition for allowance. An indication of the same is respectfully requested. If there are any questions regarding the application, the examiner is invited to contact the undersigned attorney at the local telephone number below.

Should additional fees be necessary in connection with the filing of this paper, or if a petition for extension of time is required for timely acceptance of same, the Commissioner is hereby authorized to charge deposit account No. 19-0741 for any such fees; and applicants hereby petition for any needed extension of time.

Respectfully submitted,

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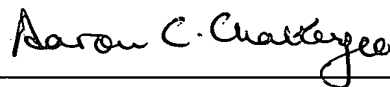
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